



California Environmental Protection Agency

Air Resources Board • Department of Pesticide Regulation • Department of Toxic Substances Control
Integrated Waste Management Board • Office of Environmental Health Hazard Assessment
State Water Resources Control Board • Regional Water Quality Control Boards



Linda S. Adams
Secretary for
Environmental Protection

Arnold Schwarzenegger
Governor

CERTIFIED MAIL: 7003 1680 0000 6174 8630

September 4, 2007

Mr. Kenneth Williams
Hazardous Materials Specialist
Division of Environmental Health
County of Lake
922 Bevins Court
Lakeport, California 95453

Dear Mr. Williams:

On August 17, 2007, the California Environmental Protection Agency (Cal/EPA) received a letter from Raymond Ruminski, Environmental Health Director, which addressed Cal/EPA's concerns with the Lake County CUPA's deficiency progress report dated July 9, 2007. The deficiency progress report explained the progress the Lake County CUPA is making towards correcting the deficiencies identified in the 2006 Certified Unified Program Agency Evaluation.

Cal/EPA recognizes that the Lake County CUPA is making some progress towards meeting the agreed upon October 2007, deadline for addressing some of the deficiencies that was established during the April 19, 2007, follow up meeting. Cal/EPA is requesting clarification on the following items explained in the letter from Raymond Ruminski:

The letter and enclosures provided Cal/EPA with a revised fee schedule and a summarized plan to add permanent staff to the CUPA program. The plan appears to be reasonable in moving the Lake County CUPA in the right direction. While work is underway to pass AB 1257, it is a budget bill requiring funding. Therefore, if AB 1257 does not pass, will the Lake County CUPA still be able to add a permanent staff to the CUPA program by December 2008? If not, please identify when this permanent staff will be added.

The letter explained how a shift in resources is allowing the County of Lake to support the CUPA obligations of inspecting business plan entities once every three years and maintaining the annual inspection frequencies for USTs. Is Cal/EPA correct in its interpretation that the Lake County CUPA will have staff resources available to meet the Hazardous Waste Generator and Cal/ARP inspection frequencies in the early part of the 2009 calendar year?

The explanation provided in the letter for addressing deficiency 6 (updating the inventory forms of businesses) addresses Cal/EPA's concerns.

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Please respond to the clarification questions by September 12, 2007.
In keeping with the 90 day cycle for submitting deficiency progress reports, the Lake County CUPA's next deficiency progress report is due October 15, 2007. If you have any questions or need further assistance, you may contact me at (916) 323-2204 or by email at jjaschke@calepa.ca.gov.

Sincerely,

[Original signed by JoAnn Jaschke]

JoAnn Jaschke
Evaluation Team Leader
California Environmental Protection Agency - Unified Program Section

Enclosure (without attachments)

cc: Mr. Raymond Ruminski, Director
Division of Environmental Health
County of Lake
922 Bevins Court
Lakeport, California 95453

Mr. Mickey Pierce (Sent Via Email)
Department of Toxic Substances Control
700 Heinz Avenue, Suite 210
Berkeley, California 94710-2721

Mr. Sean Farrow [SWRCB Evaluator] (Sent Via Email)
State Water Resources Control Board
P.O. Box 944212
Sacramento, California 94244-2102

Mr. Jack Harrah [OES Evaluator] (Sent Via Email)
Governor's Office of Emergency Services
P.O. Box 419047
Rancho Cordova, California 95741-9047

Mr. Francis Mateo [OSFM Evaluator]
Office of the State Fire Marshal
P.O. Box 944246
Sacramento, California 94244-2460



COUNTY OF LAKE

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Division of Environmental Health

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James Brown
Health Services Director

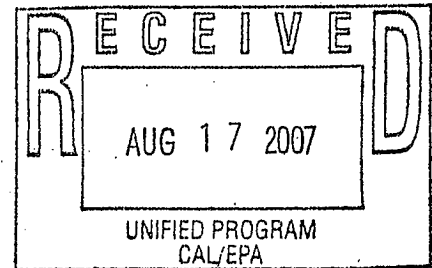
Craig McMillan MD,
Health Officer

Raymond Ruminski, REHS
Environmental Health Director

August 10, 2007

Jim Bohon
California Environmental Protection Agency
1001 I Street
Sacramento, CA 95814

re: CUPA Progress Report for County of Lake



Dear Mr. Bohon,

This letter is in response to your letter of July 27, 2007. We appreciate your interest, as the County of Lake works toward compliance with our CUPA obligations. Enclosed you will find our new fee ordinance that became effective July 26, 2007. Ken Williams, Hazardous Materials Specialist has produced preliminary estimate of the revenue increase due to the re-categorization of the CUPA permit fees. It is likely that the revenues from the CUPA fees will increase slightly more than twofold.

A revenue increase in the local CUPA program fees and the expected CalEPA contribution as a result of the AB 1257 changes in the rural CUPA funding program will put us in a position to request additional permanent staff positions beginning with the 2008-2009 budget year. The table below summarizes a plan to add permanent staff to the CUPA program.

26JULY2007	JAN2008	APR-MAY2008	SEP2008	OCT-DEC2008
BOS approves new fee schedule for CUPA program	Dept realizes increase in revenue for CUPA program	Dept requests new CUPA program staff positions in preliminary budget	BOS adopts final budget; Dept authorized to hire new CUPA program staff	Recruit, hire and begin to train new CUPA program staff

In the very short term we have shifted staff from other programs to support CUPA obligations. Time needed for adequate training is still uncertain but we are again emphasizing the goal of triennial inspections for the business plan facilities. With shifted staff and new staff it is anticipated we restore a triennial schedule for these facilities in 2009. The table here is an anticipated schedule.

JULY2007	AUG-OCT2007	NOV-DEC2007	2008	2008
CUPA staff is supplemented with (0.5 FTE) EH tech	CUPA training for EH tech; CUPA facility inspections by EH tech started	EH tech performing selected, follow-up CUPA facility inspections	EH tech performing CUPA facility inspections independently	Staff performing routine CUPA site inspections on triennial schedule

The short term increased staffing level will move us back into compliance with the minimum requirement for inspection of facilities without underground tanks once every three years. The

additional staff position(s) will let us effectively maintain the required CUPA inspections as well as complete other aspects of the CUPA program.

The question revolving around deficiency #6 seems to be a communication problem from this agency to you. We are updating the inventories every year with each of the CUPA facilities. We do this at the time of billing when we send, with the invoice, a letter for the facility to certify the old Business Plan for any changes (see enclosed form). If there are any changes, the facility submits the change in the inventory or the business plan last submitted (see enclosed form). This is followed up by correspondence until complete. The "updating" that was mentioned in the report to you is a verification that the inventory that was last submitted or certified that year, is in fact still correct. I believe this should be satisfactory to comply with deficiency #6. If it is not please respond back as to how we can improve this.

If you have any questions or comments or if you have specific suggestions that may benefit our program please contact Ken Williams or me at any time.

Sincerely,

A handwritten signature in cursive script, appearing to read "Raymond Ruminski".

Raymond Ruminski
Environmental Health Director